

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JULIO ROCHA,

Plaintiff,

- against -

CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON, and AXIS SPECIALTY EUROPE
SE,

16 CV 02327 (RJD) (RML)

**DECLARATION OF MICHAEL A.
KNOERZER IN OPPOSITION TO
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

Defendants.

MICHAEL A. KNOERZER, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner in the law firm of Clyde & Co US LLP, counsel for Defendants

Certain Underwriters at Lloyd's, London and AXIS Specialty Europe SE. I submit this Declaration in Opposition to Plaintiff Julio Rocha's Motion for Preliminary Injunction Requiring Defendants to Pay Defense Costs.

2. Attached hereto as Exhibit A is a true and correct copy of the Superseding

Indictment filed in the matter of *United States v. Hawit et al.*, Cr. No. 12-252 (S-1) (RJD), ECF No. 102.

3. Attached hereto as Exhibit B is an Agreement between Julio Rocha and the

Federation Internationale de Football Association ("FIFA") dated December 27, 2012, which was provided to Defendants' counsel by Plaintiff's counsel.

4. Attached hereto as Exhibit C is a copy of the August 2011 edition of the FIFA Statutes, which are publicly accessible at:

http://www.fifa.com/mm/document/affederation/generic/01/48/60/05/fifastatuten2011_e.pdf.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 10, 2016

/s/ *Michael A. Knoerzer*

Michael A. Knoerzer